



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

FERNALD
LOG M-01313

JUN 23 8 25 AM '99

FILE: 6446.6

LIBRARY: _____

2346

George V. Voinovich
Governor

June 21, 1999

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: Comments - Lime Sludge Ponds IRDP

Dear Mr. Reising:

Ohio EPA has reviewed DOE's April 19, 1999 submittal, "Transmittal of Draft Integrated Remedial Design Package for Lime Sludge Ponds". Attached are Ohio EPA's comments on the document.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.
Manager, TPSS/DERR,CO

Q:\FEMP\OU5\A3\LSPIRDP.WPD

000001

IRDP for Lime Sludge Ponds

Implementation Plan

General Comment

1. Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. #: Line #: Code: C
 Original Comment #:
 Comment: The plan should be revised to remove the above WAC area south of the K-65 trench from the construction area. Currently the construction area encompasses this area. All activity should be excluded from this area to prevent the contractor from disturbing above WAC soils.

2. Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. #: Line #: Code: C
 Original Comment #:
 Comment: The plan should be revised to include additional detail regarding any preliminary dewatering activities. Such activities are mentioned but no details are provided. Early efforts to dewater the sludge would seem beneficial for both excavation and placement activities.

3. Commenting Organization: OEPA Commentor: OFFO
 Section #: Pg. #: Line #: Code: C
 Original Comment #:
 Comment: This document does not address the issue of how slumping and/or infiltration in the coarse grained material will be handled or prevented during excavation. Additional detail regarding options that may be employed should be discussed. DOE may want to consider dewatering the perched zone to a level below the planned excavation limits prior to starting excavation.

Specific Comments

4. Commenting Organization: OEPA Commentor: OFFO
 Section #:3.1.1.4 Pg. #: 3-3 Line #: 5-10 Code: C
 Original Comment #:
 Comment: DOE should make all reasonable efforts to exclude the chipped material from the lime sludge. Placing unnecessary quantities of Category 4 material in the OSDF is undesirable and should be avoided.

5. Commenting Organization: OEPA Commentor: OFFO
 Section #:3.1.2 Pg. #: 3-6 Line #:12-13 Code: C
 Original Comment #:

Mr. Reising
June 21, 1999
Page 2

Comment: The sentence references certification sampling affecting actual excavation depth. It is unclear if the sentence is referencing post WMF operation since certification sampling is not proposed prior to construction of the WMF. Please clarify.

6. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.2.2 & 3.2.3 Pg. #: 3-11 Line #: 5-6 & 12-13 Code: C
Original Comment #:
Comment: There appears to be confusion in these two sentences regarding the discharge point for the perimeter drain lift station. The document should be revised to clarify if the perimeter drain lift station goes directly to the storm drain system or to the WMF lift station.
7. Commenting Organization: OEPA Commentor: OFFO
Section #: 3.2.4 Pg. #: 3-11 Line #: 17-18 Code: C
Original Comment #:
Comment: The Implementation Plan and other documentation fail to clarify why the WMF would only be used during the construction season. It would seem appropriate to continue to pump water from the excavation areas even if construction was not on-going. This would limit infiltration, contaminant migration, and improve working conditions upon startup. Specifically excluding winter operation appears to be too limiting. DOE should reconsider designing the system to handle winter operation.
8. Commenting Organization: OEPA Commentor: OFFO
Section #: 4.2.5 Pg. #: 4-4 Line #: 5 Code: E
Original Comment #:
Comment: The sentence appears to be a typo. Please revise.
9. Commenting Organization: OEPA Commentor: OFFO
Section #: 4.4 Pg. #: 4-5 Line #: Code: C
Original Comment #:
Comment: Considering the WMF will only have a single liner and may contain a number of contaminants not currently present in the area. Additional project specific monitoring of the perched groundwater zone should be conducted to ensure any impact from the WMF can be detected. The document should be revised to include on-going project specific monitoring of the perched ground water in the vicinity of the WMF.

Mr. Reising
June 21, 1999
Page 3

10. Commenting Organization: OEPA Commentor: OFFO
Section #: Table 6-1 Pg. #: Line #: Code: C
Original Comment #:
Comment: In accordance with the IMPP a category 5 material specific placement plan will need to be developed for disposal of the lime sludge into the OSDF. The placement plan should be submitted with the revised IRDP.

11. Commenting Organization: OEPA Commentor: OFFO
Section #: Table 6-1 Pg. #: Line #: Code: C
Original Comment #:
Comment: Again, Ohio EPA recommends DOE take measures to assure the 300 yds³ of Cat 4 material is not generated for OSDF disposal.

Design Criteria Package

12. Commenting Organization: OEPA Commentor: OFFO
Section #: 1.2.2.3 Pg. #: 1-6 Line #: 17 - 18 Code: C
Original Comment #:
Comment: This sentence states that the water will be classified based upon the origin of excavation at the time. Additional detail should be provided on how the water will be sampled and the decision will be made as to what classification the water is.